

Declaration of Jane Doe, Plaintiff

I, the plaintiff herein and known as Jane Doe in this lawsuit, declare under penalty of perjury that the following is true and based on my direct personal knowledge:

Dealings With Hazel Sanchez

1. I have read the admissions of Hazel Sanchez, from her plea agreement, that appear in my lawyer's opposition to the defendants' motions to dismiss this case. I know the admissions set forth in ¶¶2, 5, 6(a), 9, 11, 12 and 14 to be accurate.

2. While working for Hazel I met although I did not frequently see another Costa Rican woman trafficked by Hazel, whom I knew as Vanessa. It was at my deposition in August 2022 that I learned that Vanessa's full name was Cindy Vanessa Alvarado. I know that in documents in Hazel's criminal case, trafficked women were designated by their initials. I am "M.R.F." in these documents. The woman I knew as Vanessa is "C.V.A."

3. I have also read the admissions of Hazel to the judge appearing in my lawyer's opposition memorandum. I know these admissions to be accurate.

4. While I was initially recruited in Costa Rica by "Nicole" to be a nanny and housekeeper in the United States, I was also informed that Hazel could set me up for dates with wealthy men, and that if I agreed, I could also have sex with these men, get paid, and remit an agreed portion of the pay to Hazel.

5. Prostitution is legal in Costa Rica. I did not imagine that Hazel was suggesting unlawful activity in inviting me to go on these dates. I did not know where I would be going in the USA. I did not believe Hazel was proposed for me to do anything illegal.

6. I never worked as a prostitute in Costa Rica. My first husband so claimed to Costa Rican media after our highly unpleasant divorce in mid-2009. Since he himself was a well-known media personality, this accusation received a great deal of embarrassing publicity.

7. My husband had not permitted me to work while we were married. During the first half of 2010, he stopped providing me with financial support. I had only an ninth grade education, and was not in a position to get a well-paying job. I was thus in difficult financial and emotional circumstances at the time I was recruited on behalf of Hazel in 2010. I figured I could work for a short while in the United States, earn far more money than I could possibly earn in Costa Rica, and return home. So I agreed, and shortly thereafter received round-trip tickets from Hazel which called for my return home in two weeks. I understood that if things worked out, I could return for more work in the USA.

8. Hazel asked me to post photographs of myself on line, on something called "Eros." I did not know what the Eros site was and was unable to do this, and instead I sent Hazel photographs of myself in a sun-dress and a bikini. I assumed she would use these photographs to get me dates, as described. I never saw any of these photographs posted on line. Later, Hazel had other, far more provocative, photos of me posted on line.

9. Things did not turn out as "Nicole" had promised. When I arrived in Virginia, Hazel took my passport and told me that I was going to provide sex to her clients, and if I didn't do so my only child, my son Sebastian, would be harmed or killed. I was, and throughout remained, terrified of her. I had panic attacks upon learning, years later, that she had gotten out of prison.

10. From October 11, 2010 until April 25, 2015, I provided commercial sex on demand for Hazel's clients, mostly out of one apartment in Fairfax but also in other Fairfax locations and

also New York. I was required to have sex, at Hazel's demands, with up to 17 men per day, every day, and to do whatever the clients demanded, no matter how harmful or demeaning. Clients often engaged in abusive behavior, including inserting objects and drugs provided by them or by Hazel into my vagina, dropping hot candle wax on my body, and engaging in rough sex. This happened hundreds of times. I was forced to have sex while I was pregnant, and had a miscarriage as a result. I worked twelve hours each day -- from 8 AM to 8 PM or 10 AM to 10 PM and sometimes later. Sometimes the clients took me to another location, a house or a hotel. When in the Fairfax apartment, I was prohibited from eating between 8 AM and 8 PM and ordered not to leave. I went along with all this abuse out of fear that my son would be killed or hurt if I did not cooperate.

11. Over the course of the five years I worked for Hazel, I made thousands of dollars per day for her, as did the other women who worked for her and with whom I occasionally shared the Fairfax apartment. Hazel got all the money; the other women and I kept none of it. Hazel paid for the apartment, utilities and food. Several times a year, Hazel told me (and also the other women) to return briefly to Costa Rica. On these occasions she would give me \$2,000 or \$2,500 in cash, in an envelope.

My Time With [REDACTED]

12. I ran away from Hazel in April 25, 2015. I had nowhere else to go and knew no one in the States other than my co-workers and my traffickers. I went to a nearby extended-stay hotel where I knew other sex workers were living. They were working for a man named Jose who operated his own trafficking ring and shared clients and sex workers with Hazel. (I never worked

for Jose.) The women let me stay there and told me they would protect me from Hazel, but that I had to leave if she was coming. I remember leaving that hotel numerous times in fear, rain or shine, walking in the street or in a nearby mall waiting to return to the hotel.

13. At the hotel to which I had fled, I saw a client I had first met on several occasions while working for Hazel. His name was [REDACTED]. He had always treated me gently and nicely. On seeing me in the hotel, he said he had been looking for me. He told me I could go live with him and that he would protect me from Hazel. He said he was wealthy and wanted to take care of me. I was desperate, as I could not remain in the hotel to which I had run. I was penniless, scared, and without working papers in the USA. I saw [REDACTED] as my savior. I was so unused to being treated nicely by men that [REDACTED] behavior overwhelmed me. I immediately fell in love with him, or so I thought. He suggested that we get married and I agreed. We were married in May 2015.

14. We lived in an apartment in Fairfax County. [REDACTED] said his credit was poor and as a result he could not get a lease. He thus directed me to rent the apartment in my name, because, he explained, the landlord could not discriminate against me as a foreigner without credit. I saw no reason not to comply, and thus, even though I had no credit, I was able to rent the apartment. [REDACTED] paid two months' rent up front, and thereafter paid for all our expenses - rent, utilities, food, etc.

15. [REDACTED] turned out not to have the assets he claimed. What he did have, however, was a great deal of debt. He also told me that his father was very ill, and that he needed money for his medical bills. He told me that if I was to remain with him, I was going to have to work to raise money for him to pay his debts. I had no job, no work papers, and no means of returning to

Costa Rica. [REDACTED] told me that he would arrange for me to sell commercial sex in order for us to remain together. I was afraid of losing the support system that I had in [REDACTED] and becoming homeless, so I agreed to his demands and proceeded to provide sex to clients arranged by him. I did not personally profit financially from my sex work for [REDACTED], as he received and kept the money I was paid, spending it as he saw fit.

16. I did commercial sex work for [REDACTED] from the summer of 2015 until I was arrested in November 2016 for prostitution and providing massage without a permit. These charges were reduced to trespassing, to which I pled guilty and for which I paid a fine. Following my arrest, I never participated in commercial sex again.

17. [REDACTED] disappeared immediately after my arrest, following which he returned and left again numerous times. We could not make our relationship work. [REDACTED] kept leaving home. He was occasionally abusive, and I learned that he was dealing drugs. By then, I had been befriended by another man, [REDACTED]. I believed [REDACTED] took a sincere interest in me, although he was married at the time. He assisted me financially, including paying my fine following my arrest. By early 2017, I decided to file for a divorce from [REDACTED]. I eventually did so in early 2018, after [REDACTED] left home for the last time. I have not seen [REDACTED] since I filed for divorce. For reasons I don't know, getting my divorce took a long time. I believe there was a problem getting legal papers to [REDACTED], whom my lawyer from Legal Services could not find. I finalized my divorce from him in 2020.

18. In May 2017, [REDACTED] and I had an extremely difficult time. I was very upset with him, and he with me. Somehow we managed to get past our differences and hostility. We stayed together and have been together ever since. [REDACTED] divorced his wife in 2020. We have lived

together since 2019. The terrible problems that came between us in 2017 are resolved and we are happy together.

19. I told the FBI and the United States immigration authorities about my work for Hazel, my marriage to [REDACTED], and my commercial sex work on his behalf. At the time, I was getting a divorce from [REDACTED]. He was worried about my having been arrested and what that might mean for him, as he had arranged for my clients and kept the money I was paid. I was worried that he was going to lie or ask me to lie about my sex work on his behalf. I recall telling him that lying was useless because the police had the papers on my arrest, and it was impossible to avoid the truth. I told everyone who asked the truth, including the FBI, the immigration authorities, and the Fairfax Police officer who interviewed me in mid 2017 about my problems with [REDACTED].

20. I understood from *pro bono* immigration counsel at Jenner & Block that I would not receive citizenship at the time, only possibly the right of continued presence in the United States and then, hopefully, a T-visa as a victim of crime. Both the FBI and the immigration authorities advised me that I was considered a crime victim. I received my T-visa in August 2020. On no occasion did I have to defend against any sort of deportation notice or deportation proceeding.

21. In April 2017, I received a work permit from American immigration authorities. I briefly worked as a house cleaner and then in May, began work as a server at Uncle Julio's Restaurant in Fairfax Corner. Thereafter I did the same work at the Olive Garden Restaurant in Fair Lakes, where I worked until early 2019. At that time I had already started working at NOVA Eye in Sterling as an optometrist's technician. (I received on-the-job training.) I stopped working at NOVA Eye around June 2019 because the pay was insufficient, and I took a job as an

Amazon delivery person at a considerably higher hourly wage. That did not work out after two months (I was not fast enough), and in August 2019 took a job as a patient representative with Retina Group of Washington. One year later, I was promoted to the position of ophthalmologist's technician assistant. I left that job in December 2021 when [REDACTED] and I moved to Florida so that he might be able to see his children, who had moved to Florida with their mother.

Identification of Clients

22. After I denounced Hazel to the FBI, FBI agents showed me photographs of many men. They did not ask me if any of the men whose photographs I was shown were my clients, but rather, whether I recognized any of them. From the photographs I was shown, I thought several of the men to be familiar and said so. I was not given their names and did not know them.

23. At the time I filed this lawsuit, I did not know the actual names of any of the men who had been Hazel's clients. Like the sex workers ourselves, clients did not typically use their real names. (I was given the name Diana by Hazel.) Having learned that [REDACTED] [REDACTED] had admitted being clients of Hazel, on advice of my lawyer I alleged in my initial complaint that "on information and belief" [REDACTED] had been my clients. I understood this to mean that this was what I believed, but that I was not sure.

24. When asked in discovery if I contended that [REDACTED] had been my client, I responded that I was not sure and would have to see and hear them in depositions to be sure. Until I could be sure, I dropped the claim that "on information and belief" these two men had been my clients.

25. The evening before my deposition, my lawyer showed me photographs of several men. One, a photograph I had not been shown by the FBI, was of a man I easily recognized as a client while I worked for Hazel. The photograph was of [REDACTED]. For this reason, when asked at my deposition the next day if [REDACTED] had been one of my clients while I was working for Hazel, I said yes, since I had previously recognized his picture and had been given his name.

26. I had stated in my interrogatory answer that before I could tell if [REDACTED] had been a client of mine, I had to see or hear him in a deposition. He did not appear at my deposition, so on that occasion I could not identify him as a client. When defense counsel first asked me whether [REDACTED] had been my client, she did not show me any photograph of him, and simply used his name. Unfortunately (I was very nervous throughout my deposition), I confused his name with the name of [REDACTED], whom I had previously easily recognized as a client from a photograph. While stating that [REDACTED] had indeed been my client, I proceeded to describe [REDACTED] (*e.g.*, having blue eyes and gray hair) as the person I was talking about. My lawyer, who knew I was describing [REDACTED], not [REDACTED], offered to help clarify matters, but his offer was rejected and I continued speaking about [REDACTED] in response to questions about [REDACTED]. In due course, I clarified that I had not been talking about [REDACTED], but about [REDACTED].

27. I then viewed [REDACTED] subsequent deposition on Zoom, following which I confirmed in a supplementary interrogatory response that he too had indeed been a client of mine while working for Hazel.

28. I had severe flashbacks to commercial sex encounters when shown photographs of [REDACTED]. The flashbacks were unusually sharp and disturbing. For this reason, I felt confident that he too had been a client of mine and so testified at my deposition. It was thereafter, upon viewing and listening to [REDACTED] Zoom deposition, that I became certain that he had indeed been my client while I worked for Hazel.

Dated: October 23 2022

Jane Doe (MRF)
Jane Doe ("M.R.F.")